

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	:	<b>CRIMINAL NO.</b> _____
	:	
<b>v.</b>	:	<b>DATE FILED:</b> _____
	:	
<b>VANCOUIER BARRETT</b>	:	<b>VIOLATIONS:</b>
	:	<b>18 U.S.C. § 1341</b>
	:	<b>(mail fraud – 4 counts)</b>
	:	<b>18 U.S.C. § 1028(a)(7)</b>
	:	<b>(identity fraud - 1 count)</b>

**INDICTMENT**

**COUNTS ONE THROUGH FOUR**

**THE GRAND JURY CHARGES THAT:**

1. At all times material to this indictment, MCI Worldcom (“MCI”) was in the business of selling cellular telephones and cellular telephone service. In doing so, MCI operated in interstate commerce and its activities affected interstate commerce.

2. At all times material to this indictment, defendant VANCOUIER BARRETT worked as a salesperson for MCI in its Bala Cynwyd, Pennsylvania office, selling cellular telephones and cellular telephone service.

**THE SCHEME**

3. From at least in or about June 2000 through on or about December 30, 2000, defendant

**VANCOUIER BARRETT**

devised and intended to devise a scheme to defraud MCI and to obtain money and property by means of false and fraudulent pretenses, representations, and promises.

## **MANNER AND MEANS**

It was part of the scheme that:

4. Beginning sometime around June 2000 or earlier, and continuing until on or about December 30, 2000, defendant VANCOUIER BARRETT created fraudulent records which documented sales of MCI cellular telephones and telephone service to customers. In fact, these sales were fictitious and the customers had not purchased the telephones or service described in the fraudulent documents.

5. Defendant VANCOUIER BARRETT created the fictitious sales using various methods, including adding unauthorized sales of cellular telephone and telephone service onto otherwise legitimate service agreements, and creating entirely fraudulent service agreements based on information taken from legitimate accounts.

6. In generating the fraudulent and fictitious sales, defendant VANCOUIER BARRETT improperly and without authority used various means of identification of MCI customers, such as names, social security numbers, dates of birth, and driver's license numbers, so that the service agreements would appear legitimate, and MCI would process them through its offices in Linthicum, Maryland and elsewhere.

7. After defendant VANCOUIER BARRETT created the fraudulent service agreements described in this indictment, they were provided to another MCI employee in the Bala Cynwyd office who then sent the service agreements for processing to MCI's offices in Linthicum, Maryland.

8. As a result of this fraud, defendant VANCOUIER BARRETT improperly obtained at least \$84,988 in cellular telephones and at least \$21,600 in sales commissions from

MCI.

9. On or about the dates set forth below, that is, within approximately one week of executing the service agreements, in the Eastern District of Pennsylvania and elsewhere, defendant

**VANCOUIER BARRETT,**

for the purpose of executing the scheme described above, and attempting to do so, knowingly caused to be delivered by mail and commercial interstate carrier according to the directions thereon, from Bala Cynwyd, Pennsylvania to Linthicum, Maryland, fraudulent service agreements as described below:

COUNT	DATE	DESCRIPTION
1	December 7, 2000	Service agreement for K.S.
2	December 7, 2000	Service agreement for G.R.
3	December 7, 2000	Service agreement for P.S.
4	December 21, 2000	Service agreement for B.C.

All in violation of Title 18, United States Code, Section 1341.

**COUNT FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Counts One through Four are incorporated here.
2. From at least in or about June 2000, through on or about December 30, 2000, in furtherance of the scheme described here, in Bala Cynwyd, in the Eastern District of Pennsylvania, and elsewhere, defendant

**VANCOUIER BARRETT**

knowingly and without lawful authority used the means of identification of numerous other persons with the intent to commit a violation of state law, that is, theft by deception in violation of Title 18, Pennsylvania Consolidated Statutes, Section 3922, when, as a salesperson for MCI, he used means of identification (including names, social security numbers, dates of birth, and driver's license numbers) of numerous MCI cellular telephone customers to create fraudulent and fictitious telephone service agreements to obtain and attempt to obtain merchandise and other things of value aggregating \$1,000 or more, that is, at least \$106,588 in cellular telephones and sales commissions, in a one-year period and thereby affected interstate commerce.

In violation of Title 18, United States Code, Sections 1028(a)(7), (b)(1)(D), and (c)(3)(A).

**A TRUE BILL:**

\_\_\_\_\_  
**FOREPERSON**

\_\_\_\_\_  
**PATRICK L. MEEHAN**  
**United States Attorney**